

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13
Fatima Carmona :
aka NestoriaCarmona-Viloria :
Debtor : BANKRUPTCY NO.: 18-13485 ELF

RESPONSE TO MOTION FOR RELIEF

Debtor, by her attorney, Brandon Perloff, Esq., by way of Response to Movant's motion, respectfully represents the following:

1. -2. Admitted.
3. Neither admitted, nor Denied. Movant's averment contains facts in documents on record before the Court. The Debtor does not have the requisite knowledge to attest to the authenticity and veracity of said documents.
- 4.-5. Admitted.
- 6.-8. Denied. By way of further response, should there be any amounts due at this time, the Debtor intends to cure said post -petition mortgage arrears.
9. Denied. By way of further response, the Debtor has paid/will pay any amounts necessary to cure her arrears to the Chapter 13 Trustee.
10. Denied. The averments set forth in this paragraph is denied in its entirety as it is a conclusions of law to which no response is necessary.
11. Movant's averment does not call for a response.

WHEREFORE, Debtor pray that the Movant's request for relief be denied.

Respectfully submitted,

Date: 3/29/2019

/s/ Brandon Perloff
Brandon Perloff Esquire.
Attorney for Debtor